

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

PAUL WILLIAMS-ISRAEL, Individually and
on behalf of all others similarly situated,

Plaintiff,

v.

IRIS ENERGY LIMITED, DANIEL
ROBERTS, WILLIAM ROBERTS, and
BELINDA NUCIFORA,

Defendants.

Case No. 1:24-cv-07046-PK

**NOTICE OF SANDRA MALETTA'S MOTION FOR APPOINTMENT AS LEAD
PLAINTIFF AND APPROVAL OF LEAD COUNSEL**

PLEASE TAKE NOTICE that on a date and time as may be set by the Court, Sandra Maletta (“Maletta”) will respectfully move this Court, pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), 15 U.S.C. § 78u-4(a)(3)(B), for entry of an Order appointing Maletta as Lead Plaintiff in the above-captioned action and approving Maletta’s selection of Faruqi & Faruqi, LLP as Lead Counsel for the Class.¹

This motion is based on the accompanying Memorandum of Law in support hereof, the Declaration of James M. Wilson, Jr. and exhibits filed therewith, the pleadings and other filings herein, and such other written and oral argument as may be permitted by the Court.

For the foregoing reasons, Maletta respectfully requests that the Court: (1) appoint Maletta as Lead Plaintiff pursuant to the PSLRA; (2) approve Faruqi & Faruqi, LLP as Lead Counsel for the Class; and (3) grant such other and further relief as the Court may deem just and proper.

Dated: December 6, 2024

Respectfully submitted,

FARUQI & FARUQI, LLP

By: /s/ James M. Wilson, Jr.
James M. Wilson, Jr.

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¹ Rules VI.A.2.a of the Individual Practice Rules of Magistrate Judge Peggy Kuo requires movants to contact the other parties to inform them of their intent to file motions and give the non-moving parties the opportunity to consent (the “Meet and Confer Rule”). Due to the PSLRA’s lead plaintiff procedure, however, Maletta will not know which other class members may move for appointment as Lead Plaintiff until after all the movants have filed their respective motions. Under these circumstances, Maletta respectfully requests that the “Meet and Confer Rule” be waived.

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Robert W. Killorin (*pro hac vice* forthcoming)

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*Attorneys for [Proposed] Lead Plaintiff Sandra
Meletta and [Proposed] Lead Counsel for the
putative Class*